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AUTHOR Koff, Robert H.; Florio, David H.
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ABSTRACT

Research and legal issues that relate to accreditation policy questions for schools, colleges, and departments of education are reviewed, and strategies for integrating empirical information and social/professional values are presented. The discussion divides into three sections: (1) information concerning a variety of contextual issues that affect accreditation and a summary of federal and state roles in the accreditation process; (2) legal and research issues that relate to accreditation with particular emphasis given to examining the difficulties associated with establishing a relationship between professional training and work performance; and (3) several ideas that may have promise for creating a new consensus concerning the appropriate bases for making accrediting decisions. (MM)

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Position Paper

Robert H. Koff and David H. Florio

29th Annual Meeting

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Accrediting Professional Education: Research and Policy Issues

Robert H. Koff

Dean, College of Education
Roosevelt University
Chicago, Ill.

David H. Florio

Director, The Dean's Network
Northwestern University
Evanston, Ill.

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Prologue

Dealing with accreditation policy reminds us of an Indian story told by Geertz (1973):

> ". . . an Englishman who, having been told that the world rested on a platform, which rested on the back of an elephant which rested in turn on the back of a turtle, asked, what did the turtle rest on? Another turtle. And that turtle? 'Ah, Sahib, after that it is turtles all the way down.' "

Shulman (1974) pointed out in relating this story, "As scholars and practitioners of education, we must learn to be comfortable as we teeter on the backs of an ever growing tower of turtles."

Introduction

Accreditation of schools, colleges, and departments of education (SCDEs) has attracted the interest of a large number of divergent groups: SCDE faculty and administrators, teacher organizations, state and federal education agencies, school administrators, school board members, parents, and citizen groups. To varying degrees, such groups have increased their role in policy making in this

field. As a result, governance issues and power politics have obscured the fundamental issues of purpose, appropriate bases for judgement, and the tasks to be performed to accomplish the purposes of accreditation. Many of the interest groups seem to assume that current accreditation procedures are appropriate. But the case is quite different. Assumptions need to be challenged; procedures need to be scrutinized and clarified; purposes need to be articulated; tasks need to be specifically designed to accomplish the purposes. These issues need to be resolved first. Otherwise decisions important to the quality of professional education will continue to result from an unhealthy mix of power politics, distrust, and professional mystique.

In this paper research and legal issues that relate to accreditation policy questions are reviewed. Strategies for integrating empirical information and social/professional values are also presented. These strategies serve as recommendations for consensus building from a base of knowledge and values rather than power politics.

The paper is divided into three sections. First, information concerning a variety of contextual issues that affect accreditation are presented. Federal and state roles in the accreditation process are summarized. Second, legal and research issues that relate to accreditation are reviewed. Particular emphasis is given to examining the difficulties associated with establishing a relationship between professional training and work performance. In conclusion, several ideas are advanced that may have promise for creating a new consensus concerning the appropriate bases for making accrediting decisions.

Accreditation: Definition and Context

What Is Accreditation?

Accreditation is a process by which an institution or program within an institution is recognized as having met certain criteria and standards. This recognition is accomplished through a variety of evaluation procedures which include three elements: *criteria*, *standards*, and *techniques* (Hodgkinson, 1975). *Criteria* are the measures of value (quality indicators) which are fundamental for program assessment. They answer the question: What is to be assessed? *Standards* are the levels of attainment, within each criterion, established for use as bases of comparison in measuring or judging value. Standards answer the question: To what extent? Standards imply minimal levels of performance acceptable for accreditation. *Technique* is the process by which educational programs are assessed, consistent with established criteria and standards. Technique includes both the process of evaluation and the instruments used to assess knowledge gained or performance abilities acquired, e.g., tests, interviews, observations, surveys, etc. In the education profession, the most recent effort to develop criteria and standards for accrediting purposes is reflected in the National Council for the Accreditation of Teacher Education (NCATE) publication of recommendations (NCATE, 1975) for the revision of the standards that were adopted by the organization in 1970 (NCATE, 1970).

Accreditation of professional education has been expected to serve a primary purpose of assuring quality. Hence the status of being accredited is viewed as good (Orlans, 1975). Quality, however, is difficult to define. There is no

commonly accepted operational definition of quality as it relates to accreditation in any professional field, e.g., law, medicine, education, etc. As a result, accreditation, as a quality control procedure, is hardly an exact science. Every profession is responsible for developing a definition of quality that takes into consideration the complexities of the field it services. Education is not uniquely culpable although the problem of accrediting SCDEs is particularly complex for four interrelated reasons. First, there is no clear concensus concerning educational goals. Second, there are substantive problems in relating educational outcomes to the characteristics of professional educators. Third, there are no clear connections between training strategies and the characteristics of educators. Fourth, power politics have made it difficult to deal with the fundamental questions associated with accrediting policy.

As mentioned at the outset, the current political climate has diverted educators from examining working assumptions from which accrediting policy is derived. This climate is primarily adversarial in character. The conditions which have shaped this climate are, in large measure, a result of the circumstances which confront education.

Contextual Forces and Professional Education

The future of education now seems quite different from the one most educators predicted for it a decade ago. Worries 10 years ago were associated with problems resulting from the management of growth. Enrollments were increasing at a rapid rate. There were plenty of tax dollars to initiate new ventures. Now education has been characterized as a "declining industry." (March, 1974). The rate of growth has been reduced markedly; in many settings we see an absolute decline in the number of students. As a result, many teachers are being laid off and some institutions of higher education have decided to discontinue their professional education programs (e.g. Johns Hopkins University). There are other problems also. Education is being severely criticized by its own leaders as well as by the public. Michael Katz (1975) has characterized public schools as "conservative, racist, and bureaucratic." The education profession is blamed by the mass media for declining test scores, grade inflation, poor management of educational resources, etc. (McCurdy and Speich, 1976).

These dissatisfactions point to the fact that public education is no longer supported by a pattern of concensus concerning either the nature of the enterprise or a system of priorities. History has shown us that the life of any social institution is gravely endangered if it is in a state of decline and the community that it depends on for support has no clear idea why, or whether, it should be supported. Under these circumstances, the schools suffer from an overload of expectations and the lack of clear procedures for sorting out priorities among conflicting points of view. This fact of life must be taken into consideration when thinking about accrediting schools of professional education.

These contextual issues have been aggravated by simplified notions of cause and effect. Internal power politics have taken valuable time and energy which could more productively be used to provide policymakers and publics with knowledge and information concerning the complexity of educational

problems. The current political forum for determining accreditation policy is a case in point. Power issues such as who determines what and how much one receives have made it difficult to discuss how knowledge and values may contribute to the development of accreditation policy.

The Political Context of Accreditation

Policy making is, by definition, a political process. The problem is not that decision making is political, but that the current bargaining mode of decision making inhibits the integration of values and knowledge into the process. The bargaining climate is typically adversarial when special interest groups are attempting to carve out a larger role in a particular policy area. This is the current case in accreditation. Teacher unions (Browne, 1976), for example, wish to have a strong voice in the accrediting arena, while SCDE faculty and administrators are reluctant to give them a larger voice. There is little doubt that both groups will continue to be involved in accrediting policy formulation. What is required is a decision-making forum that reduces the adversarial climate. In an adversarial climate, group positions are tightly held, frames of reference go unchallenged, and the complexity of the issues is neglected.

These internal battles among educators have created a vacuum of leadership for dealing with critical problems and issues. In the absence of professional leadership, the courts and legislators are acting without the needed insight and knowledge. This situation is exacerbated by the publics' perceptions of education. The public makes few distinctions among educators in its expressions of dissatisfaction with education outcomes. An initial step providing leadership is to ask fundamental questions related to accreditation policy, such as:

- Are there purposes for a national accrediting system for SCDEs distinct from those of other external evaluation systems? What are those purposes?
- What are the appropriate bases for making accrediting judgments?
- Is it possible to devise an accrediting system which preserves the autonomy and independence of SCDEs without sacrificing quality control?

The next section provides an overview of SCDE accreditation as it relates to federal and state recognition agencies and other nonvoluntary accrediting agencies.

Institutional and Specialized Accreditation

There are essentially two types of accrediting activity: institutional and specialized accreditation. Institutional accreditation is granted by regional accrediting organizations. For example, the North Central Association of Schools and Colleges accredits the total operating unit only, not individual professional schools and/or programs. Specialized accreditation of academic units within institutions is granted by a large number of accrediting organizations, each representing a professional area. The National Council for the Accreditation of Teacher Education (NCATE), for example, accredits schools, colleges, and departments of education (SCDEs) and the various program areas that are offered within them. It is important to note, however,

that whether an accrediting association accredits an institution or an educational unit and/or program within an institution, it is responsible for developing its own distinctive definitions of eligibility, criteria, standards, and operating procedures.

Specialized accrediting bodies usually require that applicants for accreditation have prior recognition by an institutional accrediting association. NCATE, for example, requires that an institution be accredited by a regional accreditation agency before its programs can be reviewed.

The majority of accreditation activity in our country is performed through nongovernmental voluntary associations. NCATE is such an association. Because the accreditation of professional education by NCATE is voluntary, it can come about only when an institution requests it. Thus NCATE cannot accredit a SCDE and its programs unless it has been invited to do so.

Federal and State Roles in Accreditation

Since 1952, with the passage of Public Law 550, accreditation has become a common means for SCDEs to obtain or maintain eligibility for federal funds. Under provisions of this law, the U.S. Commissioner of Education is authorized to create and publish an "approved list" of accrediting organizations which meet federal standards.* Accreditation by an approved agency is a prerequisite to eligibility for federal assistance under a wide variety of federally supported programs, e.g., student loans, research grants, etc. NCATE is included on the approved list; however, accreditation by NCATE alone does not qualify an institution or program for federal assistance. Institutions with SCDEs must seek accreditation from regional accrediting associations in order to be eligible to receive federal funds.

In addition to relatively recent federal involvement in accreditation, state governments long ago developed their own procedures to approve institutions and programs and to certify professional personnel. Practically speaking, state program approval is nonvoluntary, since state laws require that all public school teachers be certified by the state in which they teach. In most states there are usually two ways in which a college graduate can obtain teacher certification: 1) direct application to the state, or 2) graduation from a state-approved program. Direct application involves forwarding a transcript to the state teacher certification agency for review. By this route, an applicant who may have attended several schools and taken the proper selection and number of courses/ credit hours stipulated by the state will be certified. Under the program approval route, applicants are automatically certified if they have completed a state-approved program. This means that institutions wishing to train personnel for positions in the public schools are required to have their programs approved by the state before they can recommend their graduates for teaching credentials. Many states, e.g., California, Oregon, Pennsylvania, etc., are moving away from the option of direct application by legislating that only graduates from approved programs are eligible to receive state certification. The power of state-mandated program approval thus increases in importance.

*For the most recent revision, see the *Federal Register*, August 20, 1974.

As a result of state-mandated program approval, many institutions are visited by several external evaluators. For example, an institution could be reviewed by a regional accrediting organization and a state agency; its SCDE would also be reviewed by NCATE. The costs associated with accreditation/program review are significant both in faculty time and financially. (Florio, Koff, and Schneider, 1976). Hence many institutions decide not to be reviewed by NCATE. The decision is made much easier for these institutions inasmuch as state visitation is mandatory while NCATE accreditation is voluntary. Such institutions continue their eligibility for federal funds by maintaining their regional accreditation.

Clark and Guba (1976) report that 1,367 institutions of higher education (72 percent of all four-year institutions of higher education) have SCDEs with one or more state-approved teacher education programs; 93 institutions of higher education with state-approved SCDEs are not accredited by a regional accrediting association. Only 39 percent (or 540) of the SCDEs in the country are NCATE accredited. Since more than 60 percent of the SCDEs operate with only state program approval, and without the benefit of national accreditation, it is important to determine the purpose and value of national accreditation.*

Figure 1 illustrates levels of institutional/program accreditation by indicating the roles of federal, state, and other accrediting organizations. The figure shows that accreditation can be thought of as a continuum that includes the following: (a) Institutional Accreditation. Institutional accreditation is carried out, in large measure, by regional accrediting associations. There are instances, however, where institutions are accredited by a professional organization. For example, law schools that are not affiliated with an institution of higher education are accredited by the American Bar Association. (b) Professional School/Academic Unit Accreditation. Professional school/academic unit accreditation involves the accreditation of a specific academic unit or professional school within an institution of higher education, for example, schools, colleges, and departments of education. NCATE accredits SCDEs and their various general program areas. (c) General Program Areas. Within each professional school/academic unit, there exist a variety of general program areas that specialize in providing training for a particular career. For example, within SCDEs there may be programs to train educational psychologists, teachers, school administrators, etc. NCATE reviews all school-related programs offered by SCDEs, although primary emphasis in the past has been focused on the review of teacher education programs. (d) Program Type. Within each general program there are a variety of types. Different programs prepare students for different careers and have different training objectives. There are several ways of looking at program type — 1) by content, 2) by training strategy, 3) by target population to be served, etc. For example, teacher education programs may prepare both elementary and secondary school teachers. Teachers may also be trained for teaching in different content areas, e.g., math, reading, science, etc. Each of these program types has different training strategies, e.g., micro-teaching, field-

*The extent of nonparticipation in national accreditation emphasizes the existence of questions concerning the effectiveness of national accreditation as a quality control mechanism or screening device.

based internships, CBTE, etc. Programs may also have concentrations related to student populations to be served, e.g., urban education, bilingual/bicultural education, special education, etc.

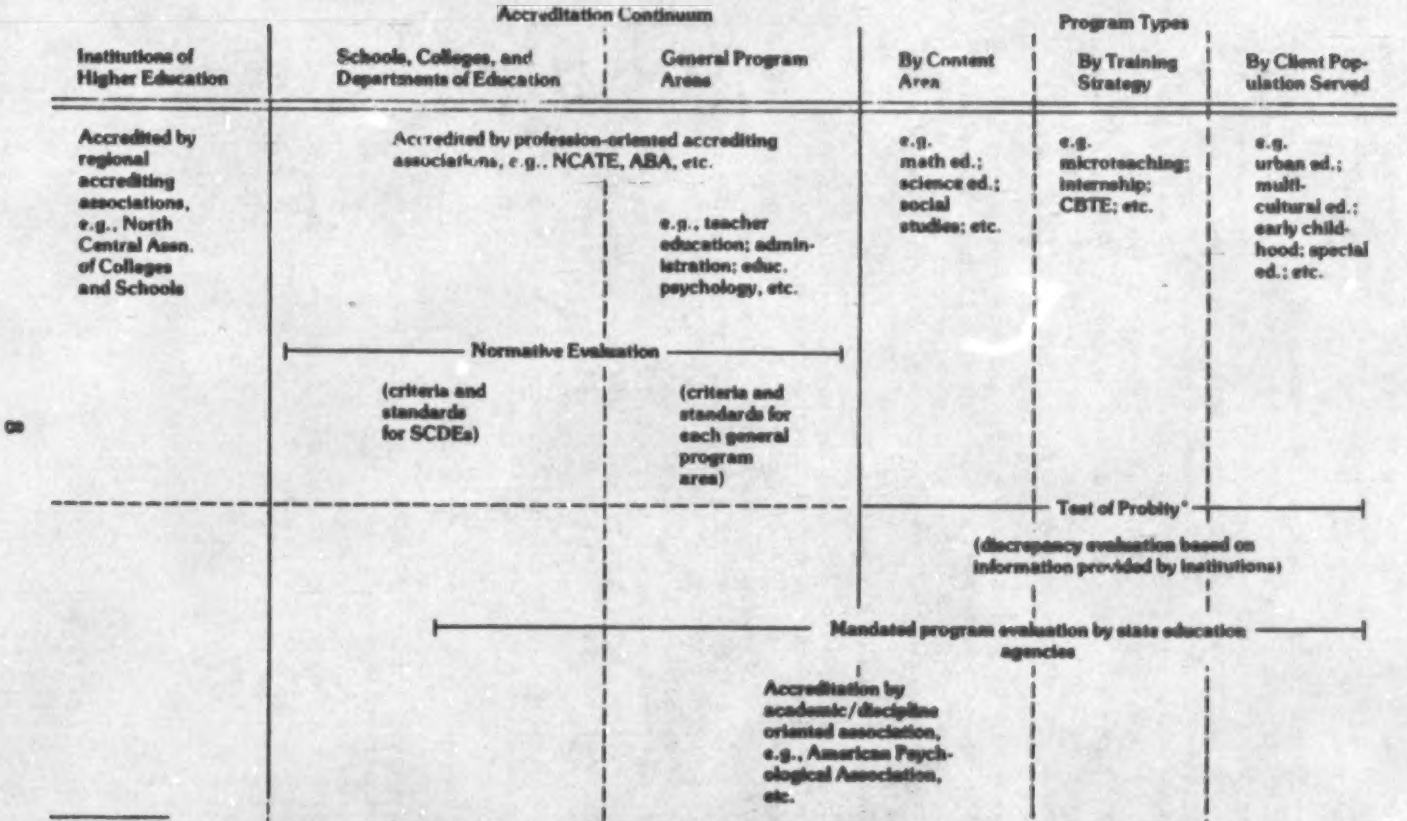
The mandated state program approval process comes into operation at the general program level and continues on through the several program types. The state is primarily interested in approving programs that offer training in areas where the state requires certification: teachers, administrators, etc. The state is also concerned with reviewing the concentrations as types available to students within each of these program specialties, e.g., elementary school teacher, secondary school teacher, principal, superintendent, etc.

Institutions and their professional schools/academic units must undergo two types of accrediting evaluations. First, they must satisfy the criteria and meet the standards established by the accrediting association. This type of assessment is called a "normative evaluation." Second, they must also demonstrate the degree to which they are performing in a manner consistent with self-made claims. This type of assessment is a test of probity called a "discrepancy evaluation." When conducting discrepancy evaluations, accrediting agencies carefully review information provided by the institution and make on-site visits in order to determine the extent to which the institution is, in fact, doing what it claims.

Information provided by the institution or subunit to the accrediting agency would first be specifically related to the criteria and standards essential to the normative evaluations. In addition, consideration should be given to the type and amount of information requested for discrepancy evaluations. Unless reasonable limits are placed on the need for this latter documentary material, the test of probity will become unmanageable. No agency will be able to review adequately and fairly the "mountains" of reports institutions will submit. Although no criteria or standards apply to the discrepancy evaluation, critical variables should be identified to serve as a guide for the development of an institution's self-report. Some have suggested an auditing model (Harcleroad, 1975; Koff, et al, 1976) in which financial status, program descriptions, and general performance requirements are reported in a prospectus. The prospectus then serves as the institutional report against which a discrepancy evaluation is made.

Normative evaluations associated with external quality control are the primary concerns of this paper; however, the problems associated with discrepancy evaluations or tests of probity should not be dismissed lightly. Considerable attention needs to be directed by educators to data collection and presentation, and their connection to discrepancy evaluations. Issues of probity are not only important for the integrity of the profession, but they also provide a) an external validation of an institution's assertions and b) an opportunity for the institution to report on aspects of its programs that it judges to reflect a unique or special character.

FIGURE 1. THE FOCUS OF ACCREDITATION


Accreditation Continuum
Program Types
Institutions of Higher Education
Schools, Colleges, and Departments of Education
General Program Areas
By Content Area
By Training Strategy
By Client Population Served
Accredited by regional accrediting associations, e.g., North Central Assn. of Colleges and Schools
Accredited by profession-oriented accrediting associations, e.g., NCATE, ABA, etc.
e.g., teacher education; administration; educ. psychology, etc.
e.g. math ed.; science ed.; social studies; etc.
e.g. microteaching; internship; CBTE; etc.
e.g. urban ed.; multicultural ed.; early childhood; special ed.; etc.
Normative Evaluation
(criteria and standards for SCDEs)
(criteria and standards for each general program area)
Test of Probity*
(discrepancy evaluation based on information provided by institutions)
Mandated program evaluation by state education agencies
Accreditation by academic/discipline oriented association, e.g., American Psychological Association, etc.

*Tests of probity are conducted by accrediting associations. The institution or professional unit is responsible for providing information related to program descriptions and institutional characteristics. Discrepancy evaluations can then be conducted which assess the extent to which an institution is able to meet its own claims.

Problems of Focus

There are at least three external evaluation systems facing SCDEs: regional accreditation, accreditation of professional education, and state program approval. Figure 1 illustrates several conceptual dilemmas concerning the purpose and focus of SCDE accreditation. For example, since both regional institutional accrediting agencies and the state review all or component parts of SCDEs, why maintain a separate accrediting system for professional education? To answer this question the following other questions must be dealt with: (a) what should be the focus of normative accrediting evaluations? (b) what are the characteristics of SCDEs or their general program areas which provide them with an identity separate from other professional schools or academic units; and (c) what are essential criteria and standards for SCDEs and general program areas if they are to be primary focus of evaluation?

Professional education accreditation can be approached in either of two ways. Accrediting activity could concentrate on the various program types by content, training strategy, or target population to be served. On the other hand, accrediting could limit its normative evaluative focus to the SCDE units and their general program areas. Figure 1 depicts a continuum for external evaluations including accreditation. Assuming that regional accreditation will continue to assess institutions of higher education, professional education must determine where, among the other areas (e.g., SCDE, general program areas, etc.), accrediting attention should be focused. That is, should accrediting focus on the macro level of the SCDE unit and general program areas or on the micro level of program type. The choice involves two very different strategies.

The micro approach requires the development of criteria and standards for each specified program type. Thus various specialized accrediting societies will be needed to review each separate program. A variety of specialized accreditation and/or professional organizations already exist (e.g., American Psychological Association, National Council of Teachers of English) and are currently serving an important professional and accrediting function. However, if the micro approach to accreditation is extended to its logical conclusion, many more accrediting groups will need to be created and/or play a role in accrediting different program types. For example, every time a new type of program is developed it will need to be accredited by an existing or newly created accrediting organization.

Reasons for the attractiveness of the micro approach may be found in research being done on educator performance. Teaching effectiveness, for example, seems to vary with the nature of the subject matter and the various types of student populations. This program-type evaluation is a strategy which is better suited to evaluating program outcomes. This kind of evaluation addresses public concerns that institutional products relate positively to the needs of the polity. For professional schools, this means that skills students acquire should be positively related to work performance.

Diverse program types, varying by content, training strategy, and target population to be served, number in the hundreds. Additionally, research relating individual characteristics to professional work is providing us with a view of the complexity of that work rather than the identification of a few essential skills. Theoretical propositions do not lead directly to "prediction and control, except in a few instances" (Shulman, 1974). The problem of criteria

and standards is thus further complicated when efforts to relate training strategies to individual characteristics are made. Orlans (1975) offers a useful description of these complications:

> After many years and millions of dollars are spent developing 'output' measures of varying reliability, the students and their schooling will have changed, which will then require the development of new measures.

If the micro approach is followed, serious questions regarding any purpose for professional accreditation of SCDEs remain. Questions also arise regarding professional education as a profession. These questions were first dealt with by Flexner (1915) and later by Lortie (1969) and by Howsam, et al (1976). The logical extension of the micro approach might result in the education profession becoming a collection of societies or groups each in search of a professional identity.

The macro approach, limiting normative evaluation to the SCDE unit and general program areas, offers a more manageable strategy for exercising quality control and helps explore the question of whether the education profession as a whole may be greater than the sum of its parts. This approach requires the establishment of essential criteria and standards for SCDEs and their program areas by using higher inference variables. The use of higher inference variables requires that the accrediting agency concentrate on making connections between human values held by the profession and the polity and the characteristics of professional schools of education and their general programs. This approach, according to Shulman, may identify some generalizable phenomena and, at worst, will help us ". . . learn only to understand the particular domain under investigation, no mean accomplishment in itself" (1974). That is, this approach should yield information which may lead to a better understanding of the complexity of the phenomena that we are dealing with. Such information may limit the ability to make social policy. Informed restraint is more desirable than mindless action.

> Social science has no magic wand with which to conjure up solutions that everyone will admire and no one has thought of. Are we obligated to recommend a solution if we see none? (Orlans, 1975)

This caveat is essential when making decisions regarding criteria and standards for accrediting purposes. Since social science provides few guidelines to the development of discreet criteria and standards, accrediting agencies must, of necessity, rely on informed professional judgments and consensus building activities that involve a healthy mix of scientific knowledge and human values. These issues are discussed in more detail in the last section of the paper.

The above analysis suggests that a national accreditation system for professional education should concentrate on the SCDEs and their general program areas. This macro approach is manageable and has more potential for furthering the profession. In this approach, normative evaluations would have a desired focus, leaving institutional accreditation to regional associations and protecting diversity within program areas. Program type evaluations would be left to tests of probity. In some cases, program types would be evaluated by state agencies.

In order to move from agreement of purpose to implementing SCDE accreditation, fundamental issues relating to normative evaluations must be addressed. The following questions summarize these issues:

- What is it that distinguishes an accreditable SCDE or general program area from one that is not accreditable? That is:
- What are the criteria and standards to be used in evaluating a) the SCDE unit and b) each general program area? and:
- Are there functionally unique characteristics of SCDEs and general program areas that give them a separate identity from other academic units, professional schools, and program areas?

The questions we have posed are designed to limit the scope of professional education accreditation while at the same time lay before the profession an agenda which requires attention. Answers to the above questions will provide the bases for making evaluative judgements. Only when criteria and standards have been delineated can questions related to accrediting tasks be adequately addressed. If questions related to criteria and standards cannot be answered, then one must ask if there is any viable rationale for a national professional education accrediting system.

In the next section, legal and research issues which relate to accreditation are reviewed. They provide a helpful background for addressing fundamental questions of purpose, bases of judgment and task clarification. An accrediting agency should know the relevant legal considerations which apply in the granting or denial of accreditation. Both legal considerations and the contributions of research must be examined when defining criteria and standards. Such an examination encourages a healthy element of restraint because it tends to define the perimeters within which criteria and standards can be developed and applied.

Legal and Research Issues

Legal Issues

When accrediting judgements are made, legal questions of due process, equal opportunity, and property must be given consideration. The evaluation of organizations involves reputation, organizational and individual questions of survival, and authority. If a single national accrediting body carries out a distinct mission in the evaluation of other organizations, antitrust questions may also be raised (Hazard, 1976). If the accreditation of professional education becomes entangled with questions of eligibility for government funding, legal questions related to government intrusion, restraint of trade/antitrust,* federal inspectorates, and agencies concerned with consumer protection will increase. Such legal questions are already being discussed with regard to institutional accreditation which is tied to government funding eligibility.** Federal demands for public involvement, consumer protection/truth in advertising, more frequent evaluations, etc., have been addressed to NCATE; however, no current legislation ties NCATE to federal funding eligibility (Proffitt, 1976). A detailed examination of these questions is not possible here; however, if the relationship between national accreditation of

*Goldfarb v. Virginia Bar Assn., 1975 and Marjorie Webster Jr. College, Inc. v. Middle States Association of Colleges and Secondary Schools, Inc. 1970.

**Hazard, 1976; Harcleroad, 1976; Harvey, 1975; and FICE, 1975.

professional education and eligibility for federal funding changes, these issues will grow in importance.*

Returning to the basic legal considerations of due process, equal treatment, and property, one is struck by the similarities between accrediting and employment judgments. Parallels exist between judgments made in accrediting programs of professional development and the legal and organizational devices used to evaluate individuals for employment in the elementary and secondary schools. The relationships exist because of the fact that a primary mission for many SCDEs is the preparation of personnel for those schools. Currently, state program approval and accreditation of SCDEs have many similar and overlapping functions. State program approval is directly related to the certification of school personnel. Certification as a test of employment is undergoing a good deal of legal scrutiny. Although the amount of case and statutory law related to the accreditation of professional education is limited, the tests of employment for school personnel, including certification, offer some valuable legal lessons for accrediting agencies.

Professional licensing and tests of employment have been the subject of a series of court cases and legal interpretations over the past half dozen years. Constitutional, statutory, and case law have been used to challenge employment/certification practices in many states and community. The landmark Supreme Court decision, *Griggs* v. *Duke Power Company* (1971), confirmed the appropriateness of federal actions to review tests of employment, as empowered by Title VII of the 1964 Civil Rights Act (as amended by the Equal Employment Opportunity Commission "Guidelines on Employment Selection Procedures" (1970). Sheila Huff (1974 and 1976) has pointed out the applicability of the Griggs case to educational institutions. When EEOC standards are applied, the critical element in judging a test of employment (including licensing) is the relationship of the test to the job for which the test has been applied. Several recent court cases have applied the "job relatedness" principle to tests of employment in education, e.g., *Chance* v. *Board of Examiners*, 1972; *Armstead* v. *Starkville*, 1972; *Baker* v. *Columbus*, 1972. In judging certain written tests of employment as unacceptable (invalid), the courts based their arguments on the failure of the employers to demonstrate a significant relationship between the test or its application and the employment for which the test was being used as a screening device.**

The strict scrutiny principles requiring predictive validity for employment tests (i.e., relating employment tests to predictions of specific job performance) have been somewhat softened by more recent case law, e.g., *Washington* v. *Davis* (1976). However, the job-relatedness principle remains an important element in the legal review of employment tests, including certification of school employees. State approval for professional education programs is directly tied to the certification of teachers and other school personnel; therefore, the criteria and standards used to judge such programs will need to demonstrate a

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*For a more detailed examination of this relationship the reader is referred to Hazard, 1976, pp. 62-88.

**For example see Hazard, 1976; Rebell, 1974; Koff, Florio, and Cronin, 1976 for a more detailed examination.

reasonable relationship to needed job skills. Strict scrutiny principles will not be applied as stringently for evaluations of institutions of higher education, however, since the courts are willing to accept general education requirements for certain sectors of employment. If the courts are willing to accept these less precise requirements in employment tests for airline pilots (*Spurlock v. United Airlines* in Rebell, 1974) and police officers (*Castro v. Beecher*, in Rebell), one can reasonably expect that general education requirements for professional school personnel could withstand a court test. This would not, however, eliminate the need to demonstrate a reasonable relationship between professional education and employment.

Job Relatedness and the Test of Reason

Current knowledge concerning the relationship between individual characteristics* and work performance in educational settings is inconclusive at best. In the field of professional education it would be nearly impossible to meet the strict requirements of predictive validity included in several early interpretations of the EEOC Guidelines (Huff, 1974). In the absence of predictively valid performance requirements or knowledge tests, a reasonable relationship between professional education and professional work will have to be accepted instead of a test of validity. Otherwise, the courts would be in the untenable position of removing nearly all state requirements which relate the professional education experience of school personnel to their certification. Assuming that the state program approval will continue to be the basis for certification of educational personnel, one can expect increased demand that professional education programs in SCDEs have at least a reasonable relationship to the work for which the educational experience is designed to prepare people.

The test of reason, when applied to the job-relatedness of educational programs, is consistent with the results of research on learning and teacher effectiveness (Berliner, 1976; Powell, 1975; Rosenshine, 1976). That is, research has yielded little empirical evidence that links training strategies to pupil achievement. The validity of various training approaches is largely determined by a reasonable relationship that can be established between training activities and the work that is expected to be done.

Legal Guides to Fairness

The legal tests applied to employment practices and state licensing/certification provide some general principles of fairness which should be applied to private accrediting bodies. The purpose of Title VII and the EEOC Guidelines is to prevent discrimination on the basis of individual characteristics not related to capacity to perform the work for which one is employed, e.g., race, sex, ethnic background, etc. This is based on the principles of equal opportunity and due process. In establishing and applying criteria and standards for accrediting SCDEs, accrediting agencies must likewise be fair.

National accreditation of SCDEs does not have the status or power of regional institutional accrediting agencies or agencies which accredit other professional groups, e.g. American Bar Association, American Medical Association, etc.

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*e.g. knowledge, skills, educational background, work experiences, etc.

If the power and importance of national SCDE accreditation grows, increased legal scrutiny of its procedures and bases of judgment will also increase.

The accreditation of professional education is, in part, a quality control device, involved with the reputation and survival of individuals and organizations. William Hazard (1976) points out that associations which accredit educational institutions will come under government or judicial review as their importance increases.

> As the consequences of denial or removal of membership in accreditation associations becomes more serious to applicants and members, the need for fair, even-handed, equitable procedures becomes more urgent. Even short of association activities falling under the constitutional restraints on state or governmental action, judicial attention to the rudimentary fairness of internal rules and procedures will push associations toward de facto due process safeguards. (Hazard, 1976)

It should be noted that many SCDEs are engaged in educational programs that reach beyond the training of school personnel. Accrediting standards and criteria should be developed which meet the tests of fairness for evaluation of all general program areas in which an SCDE engages, e.g., the education of teachers, counselors, administrators, researchers, legal and policy scholars, etc.

Research Issues

Research in education has shown over the years that phenomena which were thought to be relatively simple are in fact terribly complex. It is important to reduce available information to manageable size so that, where possible, knowledge can inform policymaking and guide practice. One major problem is the expectation that research will necessarily yeild answers to complex social problems. The value of research lies in its ability to help provide an understanding of phenomena. In many cases research results have made policy decisions more difficult by pointing out previous errors of omission or commission caused by inadequate information and/or conceptions. This has been particularly true in the study of phenomena associated with education.

Shulman (1974) points out that ". . . as social, political, or personal circumstances change, the warrant of earlier generalizations must be reevaluated," and that ". . . there is reason to believe that this will ever be the case, in that in education we are never likely to reach theoretical bedrock." Rather than despair at this state of affairs, one must derive what is useful from available knowledge while continuing to question and examine assumptions, policies, and bases from which to judge performance. As the complexity of policy issues is better understood, social policy can more intelligently be developed or limited. These matters should be kept in mind when applying information derived from research to questions of criteria and standards to be used in making accrediting judgments.

The relationship between professional education and work performance in education organizations is not well understood (March, 1974). This is in large measure the case because few connections have been established between education work and desired education outcomes, particularly student achievement (Rosenshine, 1974; Berliner, 1976). A considerable amount of education research concerned with work performance, training paradigms,

and student achievement has dealt with low inference variables (Gage, 1974). March (1974) has pointed out the various difficulties associated with developing policy recommendations from low inference variables. Thus, educators have been largely unsuccessful in their efforts to aggregate the results of research. As a consequence, the type of variables employed (e.g., low inference vs. high inference) in research and how they are linked to policy development should be kept clearly in mind when thinking about the application of research findings to developing criteria and standards for accreditation.

Wilburt McKeachie, in his presidential address to the American Psychological Association, summarizes the condition of research related to teaching and learning:

> The bad news at this point is that the work is much more descriptive than practical . . . . The good news is that we have models that seem more realistic in their level of complexity and seem more in touch with the wisdom of teachers, parents, and others who apply learning principles (1976).

He concludes that rather than yielding "simple, universal laws of learning," research is likely to provide understanding of the complexity of learning that requires different action for different learning tasks.

The complexities associated with the application of research to the formulation of accreditation policy are analyzed further in the next section. The examples we have chosen to illustrate these complexities are primarily taken from research on teaching and teaching effectiveness. They were selected because a) teacher education is a primary mission for most SCDEs, and b) teaching relates strongly to other professional work in education. For example, administration of educational institutions is, in large measure, the management of human resources such as teachers. The problems of complexity and difficulties relating training to predictive indicators of work performance obtain to a wide variety of education professions, e.g., teaching, administration, counseling, research, etc.

The absence of one commonly accepted theory of teaching and the fact that educational research over the past fifty years has not produced results that firmly link teaching to student achievement (Rosenshine, 1974; Averch, 1974) have limited efforts to derive empirically and rationally defensible performance criteria and standards for teaching and teacher education. Although several recent research efforts concerning teacher effectiveness have made progress in connecting teaching performance to student achievement, these efforts are in their infancy, and generalized results and statistical treatment of data are at "such a high level of abstraction that to make screening policy (based on such results) would be inappropriate." (Berliner, 1976).

These researchers whose work indicates optimism with regard to demonstrating that teachers can make a difference in student learning (Gage, 1972; Good, Biddle and Brophy, 1975) conclude that there is little evidence to suggest that criteria can be identified to describe a "good teacher." Rather, current findings indicate that the . . .

> orchestration of a large number of principles and skills according to the specific needs of the student and the learning situation, and not the consistent application of a small number of 'key' skills that are possessed by 'good' teachers

is what is needed (Brophy and Everston, 1975).

Teaching behaviors related to student learning in a given setting may not be related to student learning if setting, age cohort, student characteristics, subject area, or content are changed (Powell, 1976; Soar and Soar, 1976). Given these recent findings, it is not surprising that Dan Lortie (1975) finds that there is not a craft-like culture to be passed from teacher to teacher. According to Lortie, teachers develop idiosyncratic procedures to deal with the tasks and challenges of classrooms. Conventional wisdom, common sense, or dogma held by some popular theorists is being challenged. Gage (1976) found that in several recent studies the organization of presentation and higher order questioning did not necessarily relate positively to student learning.

The research on the relationship of professional education to work performance indicates few areas of common agreement regarding professional preparation programs for that work. It seems clear that the number of quality indicators (normative criteria) will remain small if appropriate caution is applied. Even when consensus can be reached on criteria, more difficulties remain in the determination of standards. It may be appropriate at times to establish criteria without setting standards until knowledge is developed to enable informed standard setting.

These problems concern the normative evaluations conducted by accrediting agencies. Accreditation, however, is not limited to normative tests of quality. *Accreditation is in part an information validating process.* The primary source of the information to be validated is the SCDE. Where such information can be compared with criteria and standards, it can be evaluated normatively. Claims made by an SCDE concerning its characteristics or program area operations are also subject to evaluation. Assuming that probity* is a criterion for accreditation, discrepancy evaluations can be applied to validate the claims or descriptive information given by the SCDE. Accrediting judgments are, therefore, made on the basis of both normative and discrepancy evaluations.

By limiting normative evaluations to those criteria and standards applicable to the SCDE unit and the program areas, and leaving other judgments to tests of probity or discrepancy evaluations, professional education accreditation will be able to meet another problem facing all accrediting agencies — the specification of the reference group to which SCDEs are compared. Hodgkinson (1975) places the issues in perspective:

> Do all institutions currently accredited form the reference group? Or, is it based on the current candidates for accreditation in terms of who are the best and who are the worst?

The criteria and standards for the entire SCDE unit would apply to all of those institutions offering the given program area. Additional claims concerning program type (e.g., elementary teacher education for urban schools) would be left to test of probity and/or to program approval by state agencies. Within program areas this would allow for institutional diversity related to training strategies, instructional style, and potential areas for work performance

*The degree of congruence between SCDE/general program descriptions and actual practice. The test of probity is taken from the legal concept of honesty and integrity.

(suburban, urban, etc.). Respect for such diversity is highly appropriate and desirable, given the tenuous state of current knowledge and the need for more research concerning the preparation of educational personnel.

The lessons from past research efforts indicate that scientific knowledge cannot provide policymakers with simple choices. The educational community should inform policymakers, including judges, about the limited number of predictive indicators, i.e., criteria and standards, associated with quality control, e.g., tests of employment, program approval, and accreditation. Since we have few predictive measures, informed judgment, available knowledge, and shared values must guide tests of reason when relating bases of quality judgment to work performance. The determination of such reasonable relationships will allow for the identification of some criteria. Obviously, for example, it is reasonable to assume that reading ability is necessary to teach reading; however, problems arise when determining which strategy is most appropriate for preparing the teacher or teaching the subject. As the complexity of phenomena is better understood, it will be likely that only a few criteria may be fairly employed in making accrediting evaluations.

The diversity among SCDEs presents additional problems. Is it appropriate to address fundamental problems of accreditation without considering differences in SCDEs and general program areas? Clark and Guba (1976) report 12 types of SCDEs within the 1,367 that have been granted some form of state approval for preparing educational personnel. These categories are based on degree offered, institution mission, and nature of control (public v. private). A wider array of categories could be developed if program type and/or training strategy within program areas were also to be considered. Because of the diversity within SCDEs, criteria and standards should be developed to apply either to the entire SCDE or to general program areas. Attempts to develope normative standards for variations within a program area, i.e., program type, will meet knowledge barriers and problems with concensus building.

Consensus Building from a Base of Knowledge and Values

The overview of legal and research issues indicates an urgent need to provide a forum in which what is known and valued concerning SCDEs and general program areas can be discussed, debated, clarified, and synthesized. As has been observed, the present decision-making forum is primarily adversarial. When adversarial bargaining is the predominant mode of decision making, those involved start from prepared positions and usually give ground as it serves their political ends. This mode limits choices and narrows the range of inquiry that can take place between negotiating parties. As a result, parties hold more tightly to their own frame of reference and models of the situation and ignore the complexity of the issues being debated.

It is recognized that education interest groups will continue to be involved in whatever political forum exists. What is needed is a new design for such a forum which will reduce the zero sum polemic battles and create a dialogue which allows new questions to be addressed.

As Susan Langer (1942) has said, "the treatment of a problem begins with its first expression as a question . . . and the way a question is asked limits and disposes the ways in which any answer to it — right or wrong — may be given."

A decision-making forum in which interested parties are permitted to ask questions and introduce empirical information, values, and beliefs will preclude the possibility that any single power group can limit the inquiry.

Hammond and Adelman (1976) suggest that such a forum should seek to integrate scientific knowledge and human values when making policy decisions. Not only is it necessary to integrate values with knowledge, but it will also be necessary to integrate evidence from various sources. In short, no single decision-making strategy will suffice. The forum for making accrediting judgments should provide a variety of ways to clarify values, present evidence, and make decisions. The appropriate style of deliberation will depend on the nature of the topic, goal preference, means to achieve goals, and the content of presentation, e.g., empirical evidence, belief, opinion, etc.

Five types of strategies could be considered for such a decision-making forum: 1) the adversary approach; 2) the dialectic approach; 3) the eclectic approach; 4) the "best person" approach; and 5) the scientific approach. This is not a comprehensive typology and each is not mutually exclusive. Rather, these approaches to decision making provide alternatives from which to choose, mix, or apply selectively. For example, the best person approach is a representational strategy while the other four deal with modes of presentation and discussion. These five types of strategies can be thought of as a collective, forensic social science (Rivlin, 1973) in which scholars using different strategies assume responsibility for stating views and positions that seek to answer the policy questions. Hopefully, this approach to developing criteria and standards will avoid making policy decisions on the basis of premature research findings. It will also reduce the pernicious social consequences of certain ideological dogma or power politics.

There is a need to assure that values and beliefs are integrated with social science knowledge. For as Levin points out, "If social science findings increasingly are used to create what appears to be technical issues out of essentially moral dilemmas, this presents a potential social danger" (1975). A decision-making forum must therefore provide a variety of approaches to problem identification and solution.

The *adversary* approach to deliberation uses the judicial model and assumes, in part, that value bias cannot be adequately separated from the presentation of empirical evidence. In essence, conflicting evidence is presented, challenges to information and procedures follow, and arguments are made, all in a common forum. The decision makers are public policymakers or professional peers. One example currently being advocated is a "science court" (Kantrowitz, 1971). A science court would allow for the presentation of knowledge, or information relating to the lack of knowledge, applicable to a particular policy issue. The adversary approach is suggested for determining accrediting criteria and standards when several alternative criteria are advocated or various evidence is presented concerning the importance of a given criterion.

The *best person* approach to decision making assumes that current empirical knowledge is inadequate to guide informed conclusions; therefore, the decisions are delegated to a "blue ribbon" group, which, from a position of experience and knowledge, makes choices. This approach is suggested when there is a weak knowledge base but a cadre of respected persons exists. In light

of previous experience, it is doubtful if any such cadre which would provide a variety of needed perspectives could be agreed upon. Therefore, representatives of various publics may need to be included in the forum.

Problems are associated with the adversary and best person approaches. Hammond and Adelman (1976) have called both approaches "ascientific" and claim that their use in the forum would be person-oriented rather than knowledge-oriented. Unless major modifications are made, the adversary approach would continue to make victory rather than consensus the goal. In the "best person" mode, there is no guarantee that policymakers would agree to the elite's choices. Critics point to the many task force reports that are ignored because their findings differed with the values of the policymakers. This is not to say that some parts of the adversary and best person approaches cannot be used. However, their critics point out areas which should be modified when they are employed. For example, adversaries may be judged initially by scholar peers rather than by lay policymakers. Instead of the literal adoption of the trial court settings, the forum could be more of a "grand jury" in which decision makers could challenge evidence and the method used to obtain it.

A third strategy, *the dialectic*, could be used when a specific position, finding, or interpretation is put before decision makers. Opposing evidence or challenges would be stated and the evidence synthesized. Again, this approach could be mixed with the other approaches already mentioned, decreasing the danger of a "victory" orientation in the adversary approach or the "personal bias" phenomenon in the best person approach.

The *eclectic* approach is one in which many kinds of evidence are considered in the determination of policies, criteria, or standards. This approach can be useful in the absence of a clear position or interpretation. The eclectic approach may be particularly useful in determining criteria when goals have been agreed to. Then all the best available evidence should be considered to determine whether or not there is a connection between any given phenomenon or configuration of phenomena and the articulated goal or objective. There is a problem regarding what level of specificity is needed when stating a goal. If the goal is too global, there will be major difficulties in applying evidence.

The *scientific* approach is generally applicable to the presentation of any empirical knowledge. Several scholars have pointed to the value of the scientific approach in both separating and integrating knowledge and values (Levin, 1976; Hammon and Adelman, 1976). The scientific approach in the presentation of evidence concentrates on the methods of obtaining and/or interpreting evidence. Gene Glass (1976) calls for a "meta-analysis" or the "statistical analysis of a large collection of results from individual studies for the purpose of integrating the findings." This procedure would be useful in determining, when possible, the relationship between SCDE and general program objectives and their actual characteristics or outcomes. It would also be useful in demonstrating the complex nature of such relationships. Concentration on the evidence, either through challenges in a professional forum or through efforts to integrate the findings of a variety of studies, would be one way to avoid the "person" orientations of the adversary or best person strategies.

The scientific approach can also be used in the determination of goals and objectives from which criteria and, where possible, standards are drawn.

Recognizing that accreditation is a procedure that necessarily involves both professional values and evaluation research, there is a need to articulate values before determining the bases for making evaluative judgments. The scientific approach can be used to analyze systematically the values or goals for an SCDE or general program area. It may also be necessary to weight such values in order to use them in the accrediting process.

Depersonalizing Value Choices

In order to reach any consensus on the values which SCDEs or their general program areas share, a procedure is needed which will increase the salience of agreement and decrease the concentration on group power, personality, and individual bias. Levin (1976) suggests that the economics of information may provide a useful example of such a procedure. In any cost-utility analysis, the utility refers to the "values of the outcomes, an estimate based partly upon intuitive evaluations" (p.132). These values or utilities can be determined by having the relevant parties rate the alternatives according to their perceived benefits.

Utility scales or weights could be placed on alternative goals or desired outcomes through impersonal rating procedures. Decision makers are asked to assign values to alternative outcomes. Where agreement is high, consensus can be built and goals are weighed heavily. Where agreement or value ratings are low, there is a need to question the validity of the goal or its uses in making accrediting evaluations.

Building consensus on criteria and standards for accreditation is therefore a two-phase process: 1) reaching agreement on those characteristics and/or outcomes which are highly valued for all SCDEs and general program areas, and 2) integrating these value choices with empirical evidence. For the first stage, an impersonal analysis of professional values is called for. Utility analysis or a science of values calls for the use of consensus building procedures, e.g., survey feedback and decision making, rating scales, delphi techniques, etc. Once the value choices are made, available knowledge must be applied to determine if specific characteristics or actions within SCDEs or program areas are linked to the value goals and/or objectives.

There are problems and benefits associated with each strategy for decision making and value/knowledge integration. Using impersonal techniques to define values raises questions associated with justice, merit, and equal protection, i.e., the tyranny of the majority. The benefits associated with using any such procedure must be weighed against any potential harm (Rawles, 1971).

In conclusion, it is time to make hard but definite choices that will affect the future of professional education. The problem of establishing a consensus concerning criteria and standards come down to this: What knowledge and values are appropriate sources of input? In our judgment, a forensic social science that employs a wide variety of inquiry strategies is most desirable. In addition, many different political constituencies will need to be involved in the deliberation and in the development of evidence. Just as the medical profession cannot establish nationwide health goals and policy, neither can educators set goals and policy they themselves must serve.

Because of the complexities associated with value judgments and empirical evidence concerning accreditation, we suggest that there is a need for a forum which will involve scholars, researchers, professional education faculty, school personnel, and other publics. We recommend that this forum develop a new basis of agreement concerning the criteria and standards that will be used to determine whether or not an SCDE and its general programs shall be accredited. Such a forum would serve to protect the education profession from acting like a thermostat. A thermostat is capable of determining when the room temperature goes above or below the point at which it is set and of taking corrective action. The thermostat, however, is incapable of asking itself whether it should be set at a particular temperature, or if it should be measuring the temperature, or if there are better ways to measure the temperature.

The task of such a forum would be to examine all aspects of current criteria and standards and accrediting practice — drawing upon educational research, the courts, and other sources of knowledge and values in order to formulate a fundamental statement of accreditation policy. In our view, this group should not be concerned with issues of governance and/or administration. Its primary role would be to seek agreement concerning the state of knowledge about accreditation and recommend to the education profession criteria and standards. It is further recommended that such policy should be subject to intensive continuous review. In this manner the profession will, as Santayna said, protect itself from "redoubling its effort when it has forgotten its aim."

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